

National Park Service Tallgrass Prairie National Preserve Donor Recognition Plan

The National Park Service (NPS) recognizes private philanthropy as both a noble tradition of the national parks and as a vital element of the Service's success. Donations come to the NPS from individuals, organizations, foundations, corporations, businesses, and other entities, purely as expressions of support, in response to the donor's awareness of needs, or as a result of an organized fundraising campaign by others. Donations are used to enhance the NPS' ability to carry out its programs and activities. Donations are not to be used as offsets to appropriated funds or to meet operational requirements. Donor Recognition Plans are required for all parks or programs that receive or are likely to receive donations.

The Director of the NPS issues policies that serve as the framework for NPS employees' conduct in relation to donation activities and fundraising campaigns which benefit the NPS. These policies can be found in *Director's Order 21 (DO-21): Donations and Fundraising*. DO-21 is intended to provide the needed flexibility in working with NPS partners. Unless specified within DO-21, the provisions of the Director's Order apply equally to NPS' dealings with all of its partners regardless of how they were created.

The NPS appreciates the generosity of those who donate directly, and those who work through authorized non-profit organizations to raise funds for the benefit of the Service's park units and programs. These organizations, individuals and entities are collectively referred to as "NPS partners". Tallgrass Prairie National Preserve's Donor Recognition Plan (Plan) is consistent with DO-21 and will be used in acceptance of donations that are to benefit the park resources in the protection, development and advancement of Tallgrass Prairie National Preserve (TAPR) operations and programs. These guidelines balance the need to express appropriate and equitable acknowledgement of donors with the need to protect the values and purposes of the National Park Service (NPS).

The authority to accept donations is identified in DO-21, section 4.2. Regional Directors are delegated the authority to accept or authorize the acceptance of donations under \$1,000,000 offered directly to the NPS, or offered to an authorized NPS partner for the benefit of the NPS. The Regional Director may re-delegate this or more limited authority to accept such donations to park superintendents or regional program managers. The TAPR Superintendent has been delegated to accept donations below \$250,000. Donations may be inspired by activities and actions by partners.

The NPS at Tallgrass Prairie National Preserve was identified by Congress to work as a public-private partnership in the preservation and education of park resources. The particular private partners exchanged hands after the park was initially established by Congress. Since January 5, 2005 the landowner and the Preserve's co-managing partner is The Nature Conservancy (TNC).¹

¹ Authorized by Cooperating Agreement Number H6355-08-0001, through 08/04/2013.

Fund-raising activity specific to the Preserve that implies or requires commitment from the NPS falls under purview of this donation policy. However, TNC is an organization with functions and responsibilities well beyond its connection with the NPS and TAPR. From a practical standpoint, as the primary land owner of 10,842 acres within the 10,894 acre Preserve, TNC has full authority to raise funds for its own operations and functions within the Preserve boundary as long as such fund-raising in no way implies NPS endorsement, utilizes the NPS arrowhead or other NPS logos, or otherwise requires any commitment from the NPS as a result of those fund-raising efforts. Donations which benefit TNC² but are not for the specific or implied benefit of the NPS at the Preserve are outside the scope of this document. Any future exception would involve identifying the specific actions clarified through a yet-to-be-developed agreement between the NPS and TNC before fund-raising occurred. Currently, there is no specific Fund-Raising Agreement between the co-managers of the Preserve, however there is the Cooperating Agreement that identifies how TAPR operates under co-management.

Chartered by Congress, the National Park Foundation (NPF) is the official charity of America's nearly 400 national parks. Funds contributed to the Foundation are invested directly into the national parks. In 2010, the estate of Helen and Howard Marr provided the financial foundation that established a specific donation account for the benefit of Tallgrass Prairie National Preserve. NPF is managing the donation account established from the Marr estate. Donations made directly to the NPF managed account will follow NPF donor recognition processes. The account is fully for the benefit of Tallgrass Prairie National Preserve in Kansas and will support the conservation, protection of, and education about resources at Tallgrass Prairie National Preserve.

As of July 30, 2011, there are no Friends or Fund-Raising Agreements. There are however numerous cooperators and organizations serving as active and on-going partners who provide support through both formal and informal arrangements. Where donations do benefit TAPR and its resources, appropriate agreements may be required and developed.

The financial needs of TAPR are diverse and include, but are not limited to, the desire for donations in the categories of capital, operations, endowment, property (real and personal), and programming, as well as special event/program *sponsors*. For the purposes of this Plan, the term "donation" includes "gifts" and refers to something of value received from an outside source without consideration or an exchange of value. Funds or other items received as a result of a competitively awarded grant from a foundation are also covered by the term "donation". Grants that are governmental in nature are not included in the scope of this plan. A "sponsor" is a donor who provides a substantial portion of the funding for an authorized event or program. Event sponsors typically receive publicity such as banners and signs at the event as well as prominent mention in printed materials and event advertisements. Recognition of special event sponsors is in Section II.F of the Plan.

This Donor Recognition plan will be reviewed each year and updated as necessary.³

² The Nature Conservancy owns the Tallgrass Prairie Preserve in Oklahoma. That is not the Preserve referred to in this document. This document only applies to Tallgrass Prairie **National** Preserve in Kansas that is congressionally established to be co-managed between the NPS and the private land owner within the NPS boundary, which is TNC.

³ This policy supersedes prior issued policy dated March 27, 2009

The roles and responsibilities of the NPS are described in DO-21. Because this Plan is an extension of DO-21, there are several references to particular sections of that document. The reader of this Plan should also be knowledgeable of the contents of DO-21 that may not be included in this Donor Recognition Plan.

I. Donor/Donation Review, Approval, and Acceptance

The support received through donations is very important to the successful accomplishment of the NPS mission, but donations must be made in a legally and ethically appropriate manner. Where donations are made for the benefit of the park and its resources, it is imperative that the integrity of the NPS/TAPR mission and its donors be maintained. When accepting a donation, it is important that TAPR weigh the totality of the circumstances surrounding the potential donation. In other words, the acceptance of the donation must 1) maintain the integrity of NPS and the Department of the Interior's (DOI) programs and operations; 2) maintain the impartiality, as well as the appearance of impartiality, of NPS and DOI, and of NPS and DOI employees; and 3) maintain public confidence in the NPS, DOI, and their programs and employees.

Before accepting a donation, TAPR will refer to the specific "Donations" guidance as outlined in Section 6.0 to 6.1.4 of DO-21. On a project-specific basis, additional fund-raising documents will be prepared when required. TAPR reserves the right to decline any gift for any reason.

TAPR will not accept any donation, which in the judgment of the park Superintendent, violates or appears to violate, the specific ethics and integrity provisions of DO-21 or the ethics and integrity provisions of federal law, regulation, or policy. No donation will be accepted from any park concessioner, company or organization under a Commercial Use Authorization, or any current Use and Occupancy holder unless there is a clear, unambiguous, written disclaimer from the donor that no consideration will be expected or accepted by the donor, *and* TAPR weighs the likelihood, as well as the perception, of conflict-of-interest and determine them to be of no significance.

II. Donor Recognition

A) Thank You Letters

All donations directly related to the Tallgrass Prairie National Preserve will be acknowledged in writing by the Park Superintendent. Should the amount or value of the donation exceed the limits of the Superintendent's delegated authority to accept such donations, a letter from the appropriate NPS official will be ensured by the Park Superintendent to be written. The letter of acknowledgement should identify the type of donation (if cash, the amount), date of acceptance, reiterate any conditions of the donation, and thank the donor.

B) Additional Types of Recognition

In addition to thank you letters, TAPR may choose to recognize a donor through a variety of ways including press releases, media photo opportunities, mementos, certificates, premiums, an

article or listing in the authorized partner's newsletter, annual report, or website, and/or event recognition, as appropriate and **subject to donor approval**. Once it is deemed appropriate to accept the donation with the conditions, in those cases, appropriate recognition will take place through one or more of the options listed below.

C) Acknowledgement on Donor Recognition Board

TAPR has determined that it is fitting and appropriate that there be a single prominent location in the park where donors are publicly recognized in a systematic and on-going manner. This will serve as both a tangible and visible record of philanthropic support for the park, and provides a means to provide public expression of the Preserve's appreciation for such support.

A Donor Recognition Board or equivalent display plaque will be located on the back porch of the Preserve's historic Spring Hill Ranch house, which currently is a primary visitor point of contact. The Donor Recognition Board will not be permanently affixed nor placed with such prominence that it affects the historic fabric of the visitor experience. A suitable location for a Donor Recognition Board may be integrated into the future design of any new visitor center or adjoined administrative facility that may be planned for the TAPR and which will likely refocus the Preserve's primary point of visitor contact.

The Donor Recognition Board will utilize a format that allows recognition of donors by the placement of name plates or other markers that can be added or removed with relative ease, facilitating the simple redesign and replacement of the entire display on an as-needed basis. Approved donor recognition may include the donor name and when appropriate in the limited space of the name plate, the type of donation. ***Corporate name scripts and logos will not be used on the Donor Recognition Board.*** Anonymity will be respected and only those donors wishing to be recognized will be acknowledged with a name plate. An anonymous name plate will be included on the plaque and updated annually.

Accumulating totals can also move donors to higher levels of recognition. Levels of recognition, such as contribution category, may be added to the Donor Recognition Board and/or an individually issued plaque at the discretion of the Superintendent as the need arises to acknowledge major financial contributions to the park. Donors over \$25,000 can be recognized with an appropriate individually issued plaque. Such individual plaques are issued to the donor for display but will not be put on display in TAPR facilities. The individual plaques may be displayed by the donor at other non-park facility locations at the donor's discretion, which provides greater opportunity to reach a more diverse audience than just the on-site displayed Donor Recognition Board that would only be seen by park visitors. The design of such individual plaques will not endorse or imply endorsement of any product or business. The contribution categories are identified in section II(c)1 below.

The TAPR Donor Recognition Board will be designed to thank all donors above a threshold (\$250 in cash or equivalent value) for a period commensurate with the level of the gift and life cycle of the facility in the year(s) following the donation *and* as space allows. This threshold will be reviewed annually and revised as needed.

Monetary contributions or other contributions which can be expressed as having direct monetary value may be recognized as follows:

1. Contribution Categories

Amount of Donation

Buffalo grass	-	-\$250- \$499
Cowboy	-	\$500 - \$999
Little bluestem	-	\$1,000 - \$4,999
Rancher	-	\$5,000 - \$49,999
Indian grass	-	\$50,000 - \$99,999
Big bluestem	-	\$100,000+

These categories, relating to natural and cultural features, will promote the human and ecological themes associated with the Tallgrass Prairie National Preserve story.

2. Park Kiosk Signage

When a significant donation is received that supports a park program in the field, the Superintendent may authorize the acknowledgement of the donation on a park information kiosk for the short term life of the project or fund raising event. A kiosk is a place where visitors go for information and provides highly visible acknowledgement of the donation. Such a location will allow for appropriate recognition without cluttering the historic and natural landscape with signage or park interpretive media. See section II.E for additional guidance.

3. Memorials

A cash donation given “in memory of” or “in honor of” an individual(s) may be recognized in the same manner as other contributions, with the same line space limitation constraints on plaques and name plates. Memorial plaques, headstones, or monuments will not be placed in the park except as authorized by Chapter 9.6 of NPS Management Policies 2006.

4. Benches/Trees/Plantings

At the discretion of the Superintendent and consistent with park needs and completed environmental compliance determinations, donations of appropriate trees for the historic orchard or other plantings may be accepted. As many TAPR resource settings provide opportunities for visitor enjoyment and resting areas, donations of benches may also be accepted. TAPR will determine the most appropriate location for these items, which will generally be placed in developed areas of the park. Recognition for a donated bench or benches, historic orchard trees, or planting will not be placed on the bench or tree marker itself, but rather may be listed on the Donor Recognition Board subject to the guidelines noted in Section II.C.1 – Contributions.

D) Site-Specific Donor Recognition for Capital Projects

Generally, it will be desirable to focus donor recognition for capital projects on the Donor Recognition Board. Given the limited space of the name plates, a Donor Recognition Board devoted entirely to capital projects or a board with an individual column for capital projects will identify the project “was made possible through a generous donation from” and then name the company, individual or XYZ organization by being identified on the name plate. In addition to being recognized on the Donor Recognition Board, it is possible that some donors may be recognized in other ways.

When circumstances warrant and as determined by the NPS as appropriate, recognition of capital contributions for preservation, rehabilitation, or construction of park buildings, structures or sites may be provided with temporary on-site signs recognizing the donors. Such instances may occur during project fundraising, construction, or for a limited short time following project completion. On-site recognition may be a condition identified by the donor before a donation is made. After careful review and consideration of the conditions identified by the donor, and should the Superintendent/ NPS determine that the additional recognition is appropriate and consistent with NPS policy and DO-21, donors may be acknowledged both at an appropriate site near the project location and on the Donor Recognition Board. Additionally a Donor Recognition Plaque may be issued to the donor for permanent placement outside of the park, where wording on the plaque does not imply endorsement of the donor, their business or a product of a business.

Issuing a donor recognition plaque or use of signage for a capital improvement project will be considered on a case-by-case basis and any conditions associated with the donation will be agreed to in writing in advance of accepting the donation. Partners involved with fundraising are not authorized to commit to any conditions in the acceptance of donations that requires any action by the NPS/ TAPR in recognition of the donor that may be counter to this policy. Advance written approval of any proposed conditions must be issued by the Superintendent before a partner may accept donations with conditions. Various forms of recognition must not impede upon the visitor experience or distract attention from the natural or cultural landscape. Plaques or other donor recognition treatment will *not* be affixed to the historic fabric of cultural resources, placed in natural zones, or otherwise be placed where they would intrude on the character of the area.

TAPR will be responsible for creating any temporary sign associated with the capital contribution. The sign will be professionally designed, informational – describing the project and clearly expressing that NPS is recognizing the donation, acknowledge donors, and be of appropriate scale so as not to intrude on the visitor experience. Donor acknowledgement as a donor credit line that includes the donor name script and business logos *may* be included as part of the recognition provided that it is short, discrete, and is unobtrusive. The level of donation required for temporary, on-site recognition will be determined on a case-by-case basis, depending on the total cost and duration of the project.

E) Credit Lines, Logos, and Name Script

Brochure or other printed material: Donor name script or logo may be included as part of the recognition provided when such placement amounts to a short, discrete, unobtrusive donor credit line at the end of the material. For example, the credit line on a park brochure may state: “This brochure was made possible through the contribution of <logo, name script, or name>”.

- **Electronic material (video, film, etc.):** The donor recognition may appear either at the beginning of the presentation or at the end. However, the use of digital on-screen graphics or “bugs” are not permissible forms of donor recognition. In the case of computerized information kiosks or other electronic displays to be placed in visitor service areas, the credit line containing the donor name script or logo may appear either at the beginning of the presentation or at the end. The recognition may not appear on the kiosk casing itself.
- **Physical items that remain in the park:** Except as noted elsewhere, donor recognition will not normally be permitted on other donated or donor funded items, interpretive waysides, recreation equipment, and other items that remain in the park. Donation acknowledgement is better suited on the Donation Recognition Board.

Recognition for all other donated or donor funded items, interpretive waysides, recreation equipment, and other items that remain in the park, may include a short, discrete, unobtrusive credit line using the donor’s name, but *not* name script or logo.

- **Boats, ATV/UTV motor vehicles, clothing, or equipment:** No donor recognition will be allowed on any of these items used by the NPS or its employees in the performance of their duties.

To maintain NPS policy that parks be free of commercialism, advertising and marketing slogans and tag lines may not appear under any circumstances. Donor recognition is not allowed on motor vehicles, bricks, benches, or other park furnishings. Donor recognition is not allowed in park areas that compete for attention with or attract attention away from the purpose for which the park was established.

F) Special Events at Tallgrass Prairie National Preserve

The primary guidance for holding special events (or “special park uses”) is found in Director’s Order 53 on Special Park Uses and in Special Directive 95-11. Director’s Order 21 applies to NPS donor or partner recognition at such events.

Special events fall into two categories; non-NPS events allowed under special park use permit, and events wholly or partially sponsored by the NPS. In either case, *the Superintendent will not allow recognition that suggests TAPR endorsement or implies NPS support in the commercialization of the Special Event.* However, the Superintendent may recognize business

sponsors by limited use of logos and name script on event facilities, signs and literature at all such special events provided that the size, scale, scope and location of business logos and name script does not dominate the event facilities or area. Events may not be “named” for sponsoring business entities, as in “XYZ Corp. Harvest Festival”.

1. NPS Sponsored and Co-sponsored Events

For officially-sponsored NPS events, the name of the event must predominate. At these events, the NPS may provide appropriate recognition provided that business names are not used in any way that would imply or suggest NPS endorsement of a product or company, or be construed as commercial solicitation or advertising. The purpose of such recognition is to acknowledge the sponsor.

To ensure against the appearance of endorsement, pre-event written agreements must spell out the responsibilities of the parties and any conditions on the offering or acceptance of the gift and should include provisions specifying the amount, type, and size of sponsor recognition signs. These provisions may be included in a special park use permit, an exchange of letters, or other written documentation.

On-site notices (e.g. banners) must be appropriate to the character and scale of the event. Such notices may be displayed for a period of time in advance of the event to encourage public attendance. Banners *must not* have text such as “XYZ Company Clean Up the Park Day” or “Clean Up the Park Day Sponsored by XYZ Company.”

Sponsors may be permitted to establish a temporary hospitality area for sponsored special events.

Distribution of free product or sample products is permitted at events co-sponsored by NPS only if the item directly relates to the purpose of the event (e.g. plastic bags for a clean-up day) or is consumable at the event. The items may be imprinted with the name of the event and recognize sponsors by name (using name script if desired), logo and website address.

2. Non-NPS Events

Guidance on this topic is found in Director’s Order 53 on Special Park Uses. *The National Park Service will not permit the public staging of special events that are conducted primarily for the material or financial benefit of the organizers or participants, or which involve commercialization or in-park advertising or publicity.* Notices on temporary displays directly associated with the event containing sponsors’ names, logos, or name script may be placed in close proximity to the event in both time and location. Banners *must not* have text such as “XYZ Company Clean Up the Park Day” or “Clean Up the Park Day Sponsored by XYZ Company” or in any way imply NPS involvement or endorsement of the event.

Donor or Sponsor distribution of free products or sample products to park visitors is not permitted at non-NPS events. Further guidance on this topic is found in Director's Order #53 on Special Park Uses.

III. Prohibited Recognition

A) Naming of Park Features or Facilities

The naming of rooms, features or park facilities will not be used to recognize monetary or in-kind contributions or other donations to TAPR or the NPS. (See 36 CFR §2.62 (Memorialization) and *NPS Management Policies* 9.6.)

B) Special Considerations

Donors will not receive special consideration regarding any law, regulation, or policy affecting public use of the park. This includes application for Special Use Permits, and the prohibitions and limitations on in-park advertising.

C) Endorsement

Acceptance of private support by TAPR is not and should not be interpreted as an endorsement of that donor, or any product or programs associated with that donor. Federal employees are prohibited from using or permitting the use of their position, title, or authority to endorse any service, product, or enterprise. This prohibition does not prevent TAPR from acknowledging the assistance provided by a donor and how that assistance has benefited the park.

D) Natural, cultural, and recreational resources (trees, buildings, trails, etc.)

Natural, cultural, and recreational resources of any kind will not be named for or in honor of an individual, organization, or business.

E) Corporate Campaigns

Advertising or solicitation for corporate campaigns involving the promotion of specific brands, products, services or enterprises of a corporate partner or associated entity may not be conducted within national park units in order to maintain the long-standing policy of the NPS that parks not be commercialized.

F) Use of the NPS Arrowhead or Images of NPS Staff in Uniform by the Donor

These uses are strictly regulated by federal law, regulation, and NPS policy. See 36 CFR11 (http://www.access.gpo.gov/nara/cfr/waisidx_04/36cfr11_04.html) and DO-52D (<http://www.nps.gov/policy/DOrders/52D--60-day.htm>) for additional guidance.

IV. Corporate Support of National Parks

Corporate support is part of the long tradition of philanthropy and shared stewardship of the National Park System as well as individual parks. TAPR and the NPS welcome and encourage corporate America's continued support of their respective missions. TAPR will follow the requirements pertaining to acceptance and recognition of corporate donations as in Section 7 of DO-21.

V. Signatures

/s/ Wendy Lauritzen
Wendy Lauritzen, Superintendent
Tallgrass Prairie National Preserve

7/28/2011
Date